

1 **SAO**
2 **ERIC DOBBERSTEIN, ESQ.**
Nevada Bar #3712
3 **QUOC THAI, ESQ.**
Nevada Bar #16015
4 **DOBBERSTEIN LAW GROUP**
9480 S. Eastern Ave., Suite 225
Las Vegas, Nevada 89123
5 eric@dobbersteinlaw.com
qthai@dobbersteinlaw.com
6 *Attorneys for WCM & Associates, Inc.*

7 **UNITED STATES DISTRICT COURT**

8 **DISTRICT OF SOUTHERN NEVADA**

9 KELLY-HARRISON, INC. an Oregon
corporation,

10 Plaintiff,

11 vs.

12 WCM & ASSOCIATES, INC., a California
corporation,

13 Defendants.
14

15
16 WCM & ASSOCIATES, INC., a foreign
corporation,

17 Counterclaimant

18 vs.

19 KELLY-HARRISON, INC. an foreign
20 corporation; DOES INDIVIDUALS I-X; and
21 ROE ENTITIES XI-XX,

22 Counter-defendants,
23

24 WCM & ASSOCIATES, INC., a foreign
corporation,

25 Third-Party Plaintiff

26 vs.

27 OLD REPUBLIC SURETY COMPANY, as
28

Case No.: 2:24-cv-1752

Dept. No.:

**STIPULATION AND ORDER DISMISSING
THIRD-PARTY DEFENDANT, GRANTING
LEAVE TO AMEND THIRD-PARTY
COMPLAINT, AND TO CHANGE
CAPTION**

Surety; HARCO NATIONAL INSURANCE
COMPANY; as Surety

Third-Party-defendant,

Plaintiff and Counter-Defendant Kelly-Harrison, Inc.'s attorney Leon Mead, Esq., of Mead Law Group LLP; Defendant, Counterclaimant, and Third-Party Plaintiff WCM & Associates, Inc.'s attorneys Eric Dobberstein, Esq., and Quoc Thai, Esq. of Dobberstein Law Group; and Third-Party Defendant Arch Insurance Company's attorney Willi H. Siepmann of Faux Law Group, all hereby stipulate and agree to as follows:

Arch Insurance Company to be dismissed with prejudice as a Third-Party Defendant.

Third-Party Plaintiff WCM & Associates, Inc. is granted leave to amend Third-Party Complaint to add Old Republic Surety Company and Harco National Insurance Company as Third-Party Defendants

The Caption in this matter be amended in all related Claims as set forth above.

IT IS SO STIPULATED.

Submitted By:
Dated this 23rd day of December, 2024
DOBBERSTEIN LAW GROUP

By: /s/ Quoc Thai

Eric Dobberstein, Esq.
Nevada Bar No. 3712
Quoc Thai, Esq.
Nevada Bar No. 16015
9480 S. Eastern Ave, Suite 225
Las Vegas, NV 89123
Attorneys for WCM & Associates, Inc.

Approved as to Content by:
Dated this 23rd day of December, 2024
MEAD LAW GROUP LLP

By: /s/ Leon Mead

Leon Mead, Esq.
Nevada Bar No. 5719
7251 W. Lake Mead Blvd., Ste. 460
Las Vegas, NV 89128
Attorneys for Kelly-Harrison Inc.

Approved as to Content by:
Dated this 18th day of December, 2023
THE FAUX LAW GROUP

By: /s/ Willi Siepmann

Willi H. Siepmann, Esq.
Nevada Bar No. 2478
2625 North Green Valley Parkway, #100
Henderson, NV 89014
Attorneys for Arch Insurance Company

ORDER

IT IS HEREBY ORDERED, ADJUDGED, AND DECREED that this Stipulation and Order is GRANTED in its entirety.

IT IS FURTHER ORDERED, ADJUDGED, AND DECREED that Third-Party Defendant Arch Insurance Company be dismissed with prejudice from this matter.

IT IS FURTHER ORDERED, ADJUDGED, AND DECREED shall have 14 days leave from the date the instant Stipulation and Order is Entered to File the First Amended Third-Party Complaint.

IT IS FURTHER ORDERED, ADJUDGED, AND DECREED that the caption in this matter be amended in all related Claims as set forth above.



January 13, 2025

UNITED STATES DISTRICT COURT JUDGE

From: Willi Siepmann <wsiepmann@fauxlaw.com>
Sent: Wednesday, December 18, 2024 12:23 PM
To: Quoc Thai
Cc: Leon F Mead II; Shirley Mattox; Eric Dobberstein; Yahaira Alvarado-Rivera; f3c09e491+matter1776300919@maildrop.clio.com
Subject: Re: WCM & Associates, Inc. adv. Kelly-Harrison, Inc.

Follow Up Flag: Follow up
Flag Status: Flagged

Ok to use my signature on the SAO.
Sent from my iPad

On Dec 18, 2024, at 12:16 PM, Quoc Thai <QThai@dobbersteinlaw.com> wrote:

My apologies, I attached the wrong versions of the Stip and Order and the Propeorsed Amended Complaint. Here are the correct version.

Sincerely,

Quoc Thai
Associate Attorney
Nói Tiếng Việt
Dobberstein Law Group
9480 S. Eastern Ave. Suite 225
Las Vegas, NV 89123
Office Dial: 702.430.8900
Direct Dial: 702.202.1288
Fax Dial: 702.995.7005
w: www.dobbersteinlaw.com e: qthai@dobbersteinlaw.com
<image001.png>

CONFIDENTIAL AND PRIVILEGED

DO NOT read, copy or disseminate this communication unless you are the intended addressee. This e-mail communication contains confidential and/or privileged information intended only for the addressee. If you have received this communication in error, we would appreciate it if you would please call us immediately at (702) 430-8900 and ask to speak to the sender of this communication. Also please e-mail the sender immediately that you have received this e-mail in error.

From: Leon F Mead II <leon@meadlawgroup.com>
Sent: Monday, December 23, 2024 9:36 AM
To: Yahaira Alvarado-Rivera
Cc: Shirley Mattox; Eric Dobberstein; f3c09e491+matter1776300919@maildrop.clio.com; Quoc Thai
Subject: RE: WCM & Associates, Inc. adv. Kelly-Harrison, Inc.

Follow Up Flag: Follow up
Flag Status: Flagged

Yes, you may.

 Leon F. Mead II, Esq.
MEAD LAW GROUP LLP
7251 W Lake Mead Blvd., Suite 460
Las Vegas, NV 89128
leon@meadlawgroup.com
p. 702.745-4800
c. 702.610-3045
f. 702.745-4805



{{.verification_code}}

From: Yahaira Alvarado-Rivera <YAlvarado-Rivera@dobbersteinlaw.com>
Sent: Monday, December 23, 2024 9:19 AM
To: Leon F Mead II <leon@meadlawgroup.com>
Cc: Leon F Mead II <leon@meadlawgroup.com>; Shirley Mattox <SMattox@dobbersteinlaw.com>; Eric Dobberstein <Eric@dobbersteinlaw.com>; f3c09e491+matter1776300919@maildrop.clio.com; Quoc Thai <QThai@dobbersteinlaw.com>
Subject: RE: WCM & Associates, Inc. adv. Kelly-Harrison, Inc.

Good morning,

I am following up on the Stip and Order and the Proposed Amended Complaint. Mr. Mead, may we use your esignatue?

Thank you,

Yahaira Alvarado-Rivera
Senior Legal Assistant
Se habla español

Dobberstein Law Group